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U.S. BANKRUPTCY
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:)
) Bankruptcy No. 03-33937-JFK
ALAN REID COFFMAN and)
BARBARA ILENE COFFMAN,) Chapter 11
)
Debtor,) Docket No. **FEE**
)
DAVID P. DONLEY, II,) **34283_**
)
Plaintiff,)
)
vs.)
)
ALAN REID COFFMAN and)
BARBARA ILENE COFFMAN,)
)
Defendants.)

COMPLAINT TO DETERMINE DISCHARGEABILITY OF
DEBT UNDER 11 U.S.C. § 523

AND NOW, comes David Donley, II ("Plaintiff Donley") by and through his undersigned counsel, Sebring & Associates, and files this Complaint to Determine Dischargeability of Debt and in support thereof respectfully states as follows:

1. This Court has jurisdiction of this matter pursuant to 28 U.S.C. §§ 1334 and 157.

2. This Motion is a core proceeding under 28 U.S.C. § 157(b)(2). This Motion is made pursuant to Rules 4007 of the Bankruptcy Rules of Procedure and § 523 of the Bankruptcy Code.

3. On November 5, 2003, Alan Reid Coffman (“Defendant Alan Coffman”) and Barbara Ilene Coffman (“Defendant Barbara Coffman”)(collectively “Defendant Coffman”) filed a Petition for Relief under Chapter 11 of the Bankruptcy Code.

4. Plaintiff Donley has a Judgment against Defendant Alan Coffman in the amount of Forty-One Thousand Four Hundred Ninety-Two and 66/100 Dollars (\$41,492.66) pursuant to a default judgment obtained in the Court of Common Pleas of Allegheny County, Pennsylvania, at Docket No. GD 02-5424.

5. Plaintiff Donley has a pending action against Defendant Barbara Coffman in the Court of Common Pleas of Allegheny County, Pennsylvania, at Docket No. GD-03-3160.

6. Both cases involve violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1, et seq.

COUNT I - 11 U.S.C. § 523(A)(2)
Violation of Unfair Trade Practices and Consumer Protection Law

7. The foregoing paragraphs are incorporated herein by reference as if set forth at length.

8. The Counts alleged by Plaintiff Donley under the lawsuits against Defendant Coffman include violations of the Unfair Trade Practices and Consumer Protection Law which are non-dischargeable under Section 523(a) of the Bankruptcy Code.

9. Plaintiff Donley and Defendant Coffman have agreed that the sum of Twenty Thousand Dollars (\$20,000.00) is nondischargeable.

WHEREFORE, Plaintiff Donley respectfully requests that this Honorable Court enter an Order finding that the sum of Twenty Thousand Dollars (\$20,000.00) is nondischargeable under Section 523(a).

Respectfully submitted,

SEBRING & ASSOCIATES



Dated: March 29, 2004

William E. Otto, Esq.
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Attorneys for Plaintiff,
David P. Donley, II